

1 DANIEL G. BOGDEN
United States Attorney
2 District of Nevada
J. GREGORY DAMM
3 Assistant United States Attorney
333 Las Vegas Boulevard South
Suite 5000
4 Las Vegas, Nevada 89101
702-388-6336

5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA

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7
8 United States of America,

9 Plaintiff,

10 vs.

11 Darlene McCord and James McCord,

12 Defendants.

) Case No.: 2:13-cr-354-JAD-PAL

) Stipulated Protective Order for Exhibits and
) Documents

13
14 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G.

15 Bogden, United States Attorney for the District of Nevada, and J. Gregory Damm, Assistant
16 United States Attorney, counsel for the United States, and Jeffrey B. Setness and Rob McCallum,
17 counsel for Defendants Darlene McCord and James McCord, that this Court issue an Order
18 protecting from disclosure to the public any discovery documents containing the personal
19 identifying information such as social security numbers, drivers license numbers, dates of birth,
20 addresses or tax information of participants, witnesses and victims in this case. Such documents
21 shall be referred to hereinafter as "Protected Documents." The parties state as follows:

22 1. Protected Documents that may be used by the defendant in its case include
23 personal identifiers, including social security numbers, drivers license numbers, dates of birth,
24 addresses or tax information of participants, witnesses, and victims in this case.

1 2. Discovery in this case is voluminous and includes more than 300 boxes
2 of documents to date. Many of these documents include personal identifiers. Redacting the
3 personal identifiers of participants, witnesses, and victims would prevent the timely disclosure
4 of discovery to defendants.

5 3. The United States agrees to provide Protected Documents without
6 redacting the personal identifiers of participants, witnesses, and victims

7 4. Access to Protected Documents will be restricted to persons authorized
8 by the Court, namely defendant, attorney(s) of record and attorneys' paralegals, investigators,
9 experts, and secretaries employed by the attorney(s) of record and performing on behalf of
10 defendant.

11 5. The following restrictions will be placed on defendant, defendant's
12 attorney(s) and the above-designated individuals unless and until further ordered by the Court.
13 Defendants, defendants' attorneys and the above-designated individuals shall not:

14 a. make copies for, or allow copies of any kind to be made by any
15 other person of Protected Documents;

16 b. allow any other person to read Protected Documents; and

17 c. use Protected Documents for any other purpose other than
18 preparing to defend against the charges in the Superseding Indictment or any further superseding
19 indictment arising out of this case.

20 6. Defendants' attorney(s) shall inform any person to whom disclosure may
21 be made pursuant to this order of the existence and terms of this Court's order.

22 7. The requested restrictions shall not restrict the use or introduction as
23 evidence of discovery documents containing personal identifying information such as social
24

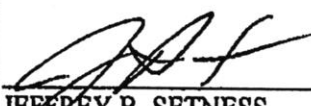
1 security numbers, drivers license numbers, dates of birth, addresses or tax information during the
2 trial of this matter.

3 8. Upon conclusion of this action, defendants' attorney(s) shall return to
4 government counsel or destroy and certify to government counsel the destruction of all discovery
5 documents containing personal identifying information such as social security numbers, drivers
6 license numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days
7 after the last appeal is final.

8 DANIEL G. BOGDEN
United States Attorney

10 J. GREGORY DAMM
11 Assistant United States Attorney

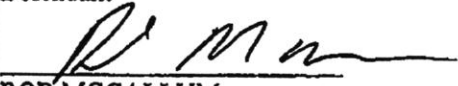
DATE

12 
13 JEFFREY B. SETNESS
14 Counsel for defendant Darlene McCord

3-17-14
DATE

15 DARLENE MCCORD
16 Defendant

DATE

17 
18 ROB MCCALLUM
Counsel for defendant James McCord

3-26-14
DATE

19
20 JAMES MCCORD
21 Defendant

DATE

22 ORDER

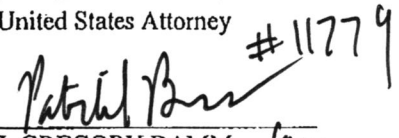
23 IT IS SO ORDERED this _____ day of _____ 2014.

24 UNITED STATES MAGISTRATE JUDGE

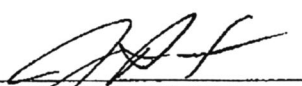
1 security numbers, drivers license numbers, dates of birth, addresses or tax information during the
2 trial of this matter.

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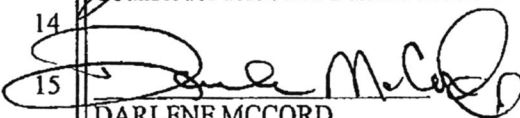
8 DANIEL G. BOGDEN
9 United States Attorney

10  #11779
11 J. GREGORY DAMM for
Assistant United States Attorney


10/3/16
DATE

12 
13 JEFFREY B. SETNESS
14 Counsel for defendant Darlene McCord

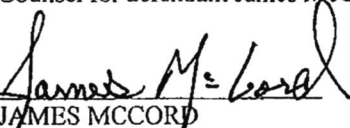
3-17-14
DATE

15 
16 DARLENE MCCORD
Defendant

3-26-14
DATE

17 
18 ROB MCCALLUM
Counsel for defendant James McCord

DATE

19 
20 JAMES MCCORD
21 Defendant

3-26-14
DATE

22 ORDER

23 IT IS SO ORDERED this 12th day of October, 2016.

24 
UNITED STATES MAGISTRATE JUDGE